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August 1, 2003

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Via Hand Delivery

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, D.C. 20554

Re: Edge Wireless Licenses, LLC.

E911 Interim Report

Dear Ms. Dortch:

Edge Wireless Licenses, LLC ("Edge") hereby files its E911 Interim Report regarding its wireless Enhanced 911 (E911) deployment and implementation status. Edge, as a Tier III carrier who is employing a handset-based technology, must begin selling and activating location-capable handsets no later than September 1, 2003 and must ultimately ensure that penetration of location-capable handsets among its subscribers reaches 95 percent no later than December 31, 2005. 47 C.F.R. § 20.18(g)(1). Further, Edge must begin delivering Phase II E911 service to the PSAPs in its service area by September 1, 2003 or six (6) months after a valid PSAP request has been received, whichever is later. 47 C.F.R. § 20.18(g)(2).

Edge recognizes the importance for public safety of Phase II E911 service. For the past several years, Edge has been actively working with the PSAPs in its service area regarding the deployment of Phase II E911 service and has been recognized for its excellent commitment to public safety. In May of 2002, Edge deployed Phase II in four counties in Oregon using a GPS battery solution from Airbiquity, working with the PSAPs and Oregon Emergency Management.

Edge provides digital wireless service in rural Oregon, Idaho, Wyoming, and California and currently operates on a TDMA network. Edge is in the process of completing a GSM overlay and turned on its GSM network for roam only July 28th, 2003. Edge's GSM system will be Phase II compliant with A-GPS GSM phones when available. Edge anticipates that it will commence selling

GSM Phase II compliant phones, if available, by January 1, 2004. At that time, Edge will begin transitioning its TDMA customers to its GSM network, but expects the transition to be a prolonged process.

As set forth below, Edge provides its responses to the information requested by the Wireless Telecommunication Bureau in its Public Notice released June 30, 2003 (Public Notice, DA 03-2113, Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings by Small Sized Carriers).

1. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid).

In April, 2001, Edge received a PSAP request from Oregon Emergency Management (OEM) for the following six counties where it currently does not provide commercial service: Washington, Clackamas, Multnomah, Marion, Polk, and Lane. However, in October, 2002, OEM sought to stay its request for Phase II E911 service, determining that there are too many unresolved issues surrounding Phase II E911 service at this time. Edge has not received notice for any of its Oregon service area.

On March 30, 2001, Edge received a letter from the State of California, Telecommunications Division, indicating that it will begin deploying Phase I and Phase II Service on a scheduled basis throughout California. Subsequently, Edge was informed that the State of California expects to have installed the necessary CPE to allow them to be Phase II capable by the end of 2004 for the following three (3) counties where Edge provides commercial service: Mendocino, Trinity, and Lake. The State of California also expects to install the necessary CPE to be Phase II capable during 2005 for the following five (5) counties where Edge provides wireless service: Del Norte, Humboldt, Siskiyou, Lassen, and Plumas.

With respect to the counties in Idaho and Wyoming where it currently provides commercial service, Edge has not formally received a valid Phase II PSAP request. Hence, Edge is not required to begin delivering Phase II E911 service to any PSAP in its service area until six (6) months after a valid PSAP request is received. 47 C.F.R. § 20.18(g)(2).

2. The carrier's specific technology choice (*i.e.*, network-based or handset-based solution, as well as the type of technology used).

At this time, Edge plans on deploying a handset-based solution for its GSM network.

3. Status on ordering and/or installing network equipment.

Upon completion of its GSM overlay, Edge will be Phase II compliant with the availability of A-GPS handsets. With respect to its TDMA network, Edge is Phase II compliant in four counties of Oregon. However, since no PSAPs are Phase II capable in any other Edge area, Edge has not deployed the Airbuiquity solution in order to be Phase II compliant. Edge will offer GSM A-GPS

handsets when such handsets are available. Edge will consider seeking relief from the Phase II requirements for its TDMA network if and when it receives a valid Phase II PSAP request.

4. If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets.

ALI-capable handsets for TDMA or GSM networks are not currently available.

5. The estimated date on which Phase II service will first be available in the carrier's network.

Edge anticipates being able to provide Phase II E911 service to roamers using GSM phones with A-GPS handsets beginning with their availability. It anticipates selling GPS-assisted phones for its GSM subscribers by January 1, 2004.

6. Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.

By December 31, 2005, Edge anticipates that GPS-assisted handsets will be available to its GSM customers. However, ultimate compliance of the Phase II E911 rules would require Edge to convert a majority of its current TDMA subscribers to ALI-capable GSM handsets in order to meet the 95 percent penetration requirement set forth in Section 20.18(g)(1)(v) of the Commission's rules. At this time, Edge is not sure whether it will be able to meet this requirement.

In the event you have any questions with respect to this matter, please contact the undersigned.

Sincerely,

200 Jky Thomas Gutierrez

Todd Slamowitz

<u>AFFIDAYIT</u>

County of Deschutes))	
)	SS	
State of Oregon)		

- I, Joseph A. Gayer, having been first duly sworn, depose and state as follows:
- 1. I am Director of Strategic Relations for Edge Wireless Licenses, L.L.C. I am familiar with the facts contained in the foregoing Interim Report of the status of Enhanced 911 Phase II compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Director of Strategic Relations Edge Wireless Licenses, L.L.C.

Subscribed to and sworn to before me this 29th day of august, 2003.

My commission expires:

(lug. 30, 2004)



CERTIFICATE OF SERVICE

I, Steven McCord, an employee in the law offices of Lukas, Nace, Gutierrez & Sachs, Chartered, do hereby certify that I have on this 1st day of August, 2003, delivered a copy of the foregoing Enhanced 911 Tier III Interim Report to the following:

John Muleta, Chief*
Wireless Telecommunications Bureau
Federal Communications Commission
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Washington, D.C. 20554

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Enforcement Bureau
Federal Communications Commission
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*via hand-delivery